



August 31, 2001

CH2M HILL
PO Box 91500
Bellevue, WA 98009-2050

ATTN: John Hoey

Re: Final Draft Report to the Washington State Legislature
Washington Stormwater Management Study

Dear Mr. Hoey:

Thank you for the opportunity to review the *Final Draft Report to the Washington State Legislature of the Washington Stormwater Management Study*. As we have stated in past reviews, the *Executive Summary* needs to present a comprehensive picture of the complexity of stormwater management. The Legislature must be presented with concisely summarized facts that explain what the problems are, where the problems are and why they exist. The *Executive Summary* in its present form reads more like an introduction than a summary.

The need for a cost to benefit analysis is identified towards the end of the *Executive Summary*. This needs to be expanded to include where potential stormwater problems truly exist. Much of Washington is arid and the potential to pollute surface waters and groundwater is non-existent or extremely remote. Stormwater management techniques that are not acceptable in some areas of the State are the most effective and responsible methods for use in others. The City of Kennewick is an excellent example of this. Our community averages a meager 8-inches of rainfall annually. The most common method of handling stormwater is by discharge to catch basins and drywells. Since there is no discharge to surface waters of the State, there is zero impact to fish, endangered or otherwise, and no degradation of water quality. Also, since the majority of these drywells have thirty plus feet of tight soils between the bottom of the drywell and the nearest groundwater the infiltrated stormwater is thoroughly filtered and again there is no water quality degradation. To require expensive and maintenance intensive pre-treatment devices in these areas is a waste of precious resources.

We assume that the chapter titled "Eastern Washington Perspectives" will be circulated for review. These perspectives need to be included in the body of the report, not as a separate chapter. It is a statewide stormwater management study and should be presented as such to the Legislature. We fully expect our input to be given due consideration during all phases of the process to develop any legislation, rules or guidance documents regarding stormwater management.

Thank you again for this opportunity.

Yours truly,

Robert R. Hammond, PE
City of Kennewick Public Works Director

Cc:	Mayor, James Beaver	Senator Pat Hale
	Representative Jerome Delvin	Representative Shirley Hankins
	Robert M. Kelly, City Manager	Tom Fitzsimmons, Dept. of Ecology

PUBLIC WORKS DEPARTMENT